

Certified Trial Attorneys

RUBIN M. SININS, ESQ. Shareholder/Partner Certified Criminal and Civil Trial Attorney RSinins@lawjw.com 505 MORRIS AVENUE SECOND FLOOR SPRINGFIELD, NJ 07081 TEL: (973) 379-4200 FAX: (973) 379-7872

www.LawJW.com

July 28, 2025

## Via ECF

Honorable Evelyn Padin, U.S.D.J. MLK Building & U.S. Courthouse 50 Walnut Street, Room 4C Newark, New Jersey 07101

Re: USA v. Boyd et al., Case No. 2:22-cr-00623-EP

Dear Judge Padin:

Pursuant to the Court's Text Order of July 22, 2025 [Doc. 294], Defendant Boyd's Reply is due by August 5, 2025. With consent of the government, we write to request an extension of time for filing until August 22, 2025. This request stems from co-counsel's upcoming change of law firms and absence from the office, together with our additional case obligations. Additional time is therefore requested for this Reply.

Respectfully,

JAVERBAUM WURGAFT HICKS KAHN WIKSTROM & SININS, P.C.

s/ Rubin M. Sinins
Rubin M. Sinins, Esq.

cc: All counsel of record (via ECF)